

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

(1) "JENNY", (2) "JANE", (3) "FIONA", (4) "ERIN",)
(5) "AMY", (6) "JESSICA", (7) "ANNA",)
(8) "TAYLOR", (9) "LILY", (10) "SARAH",)
(11) "HENLEY", (12) "JANE DOE" as conservator for)
"SAVANNAH" a protected person, and for "SKYLAR")
a minor, (13) "JOHN DOE" as conservator for "SALLY",)
(14) "MAUREEN", (15) "VIOLET", (16) "PIA", and)
(17) "MYA",)

Case No. 23-cv-474-SH

Plaintiffs,

v.

(1) JEFFREY RAHN REETZ,

Defendant.

COMPLAINT

The Plaintiffs, on their own behalf and by their corresponding next friend and through their attorney of record Laurie Koller of Koller Trial Law allege for their complaint as follows:

NATURE OF THE ACTION

1. This is a suit for damages arising out of the Defendant's violations of federal criminal child pornography statute 18 U.S.C. §§ 2252 (a)(4)(B) and (b)(2).

2. 18 U.S.C. § 2255(a) allows victims of child pornography crimes to recover liquidated damages in the amount of \$150,000, and the cost of the action, including reasonable attorney's fees and other litigation costs reasonably incurred. The Court may also award punitive damages and grant such other preliminary and equitable relief as the Court determines to be appropriate.

PARTIES

3. “Jenny” is an adult and resides outside of the state of Oklahoma.
4. “Jenny” is a pseudonym for the victim depicted in the Jenny child pornography series.
5. “Jane” is an adult and resides outside of the state of Oklahoma.
6. “Jane” is the pseudonym for the victim depicted in the CinderBlockBlue child pornography series.
7. “Fiona” is an adult and resides outside of the state of Oklahoma.
8. “Fiona” is the pseudonym for the victim depicted in the BluesPink1 child pornography series.
9. “Erin” is an adult and resides outside of the state of Oklahoma.
10. “Erin” is the pseudonym for the victim depicted in the BluesPink2 child pornography series.
11. “Amy” is an adult and resides outside of the state of Oklahoma.
12. “Amy” is the pseudonym for the victim depicted in the Misty child pornography series.
13. “Jessica” is an adult and resides outside of the state of Oklahoma.
14. “Jessica” is the pseudonym for the victim depicted in the Jessica child pornography series.
15. “Anna” is an adult and resides outside of the state of Oklahoma.
16. “Anna” is the pseudonym for the victim depicted in the MiddleModelSister child pornography series.
17. “Taylor” is an adult and resides outside of the state of Oklahoma.

18. “Taylor” is the pseudonym for the victim depicted in the RedGlassesCry child pornography series.

19. “Lily” is an adult and resides outside of the state of Oklahoma.

20. “Lily” is the pseudonym for the victim depicted in the Vicky child pornography series.

21. “Sarah” is an adult and resides outside of the state of Oklahoma.

22. “Sarah” is the pseudonym for the victim depicted in the Marineland1 child pornography series.

23. “Henley” is an adult and resides outside of the state of Oklahoma.

24. “Henley” is the pseudonym for the victim depicted in the BluePillow1 child pornography series.

25. “Jane Doe” is a pseudonym for the conservator for “Savannah” a protected person, and “Skylar” a minor.

26. “Savannah” is an adult and the subject of a court supervised conservatorship. She resides outside of the state of Oklahoma.

27. “Savannah” is the pseudonym for the victim depicted in the Jan_Socks2 child pornography series.

28. “Skylar” is a minor and the subject of a court supervised conservatorship. She resides outside of the state of Oklahoma.

29. “Skylar” is the pseudonym for the victim depicted in the Jan_Socks3 child pornography series.

30. “John Doe” is a pseudonym for the conservator for “Sally”.

31. “Sally” is a minor and the subject of a court supervised conservatorship. She resides outside of the state of Oklahoma.

32. “Sally” is the pseudonym for the victim depicted in the Jan_Socks4 child pornography series.

33. “Maureen” is an adult and resides outside of the state of Oklahoma.

34. “Maureen” is the pseudonym for the victim depicted in the Lighthouse1 child pornography series.

35. “Violet” is an adult and resides outside of the state of Oklahoma.

36. “Violet” is the pseudonym for the victim depicted in the At School child pornography series.

37. “Pia” is an adult and resides outside of the state of Oklahoma.

38. “Pia” is the pseudonym for the victim depicted in the Sweet White Sugar child pornography series.

39. “Mya” is an adult and resides outside of the state of Oklahoma.

40. “Mya” (aka “Mia”) is the pseudonym for the victim depicted in the Sweet Pink Sugar child pornography series.

41. Each of the plaintiffs is a person who was sexually abused as a child and whose sexual abuse is depicted in images of child pornography seized from defendant’s possession.

42. Jeffrey Rahn Reetz [hereinafter “Defendant Reetz”] is an adult who, upon information and belief, did reside within the state of Oklahoma at the time of the acts which gave rise to the claims herein.

JURISDICTION AND VENUE

43. Federal subject matter jurisdiction is proper pursuant to 28 U.S.C. § 1331 because this is a civil action arising under 18 U.S.C. § 2255.

44. Venue is proper pursuant to 28 U.S.C. §§ 1391(b)(1) and (2) because (i) this is a civil action brought in the judicial district where, on information and belief, the Defendant resided at the time of the offenses alleged herein and (ii) a substantial part of the events or omissions giving rise to the Plaintiffs' claims occurred in this judicial district.

FACTS

The Defendant Pleaded Guilty to Possession of Child Pornography in Violation of 18 U.S.C. § 2252(a)(4)(B) and (b)(2)

45. Defendant was charged in the United States District Court, Northern District of Oklahoma, in the matter denominated United States v. Jeffrey Rahn Reetz, NDOK Case No. 4:20-cr-00031-GKF, with the crime of Possession of Child Pornography in Violation of 18 U.S.C. §2252(a)(4)(B) and (b)(2). This crime was alleged to have been committed in or about January 2017 to on or about January 23, 2020.

46. On April 9, 2021, Defendant pleaded guilty to Possession of Child Pornography in Violation of 18 U.S.C. § 2252(a)(4)(B) and (b)(2), as charged and was sentenced with a judgment entered against him on October 7, 2021.

47. The Court, in its second amended judgment entered on December 15, 2021, ordered Defendant to pay restitution to Plaintiffs herein as victims of Defendant's crime.

Plaintiffs are Victims of Defendant's Crime of Possession of Child Pornography in Violation of 18 U.S.C. § 2252(a)(4)(B) and (b)(2)

48. Plaintiffs have each elected to receive notices via the United States Department of Justice Victim Notification System (VNS) which alerts them when they are potential victims in investigations by federal law enforcement agencies.

49. On information and belief, analysts at the National Center for Missing and Exploited Children (NCMEC) matched child pornography images on the Defendant's computer to child pornography images of Plaintiffs in NCMEC's database and notified the government of its findings in a CVIP report.

50. On or about September 28, 2020, Plaintiffs first received notice from VNS that their child pornography images were among those involved in a prosecution for possession of child pornography brought by the Government against Defendant.

CLAIM FOR RELIEF

Civil Remedy under 18 U.S.C. § 2255(a)

51. The Plaintiffs repeat and re-allege all prior paragraphs.

52. 18 U.S.C. § 2255, entitled "Civil Remedy for Personal Injuries," provides that any person who is a victim of a violation of 18 U.S.C. § 2252(a)(4)(B) and (b)(2) who suffers personal injury as a result of such violation shall recover the actual damages such person sustains or liquidated damages in the amount of \$150,000, and the cost of the action, including reasonable attorney's fees and other litigation costs reasonably incurred.

53. The Defendant pleaded guilty to the predicate federal child pornography crime found at 18 U.S.C. § 2252(a)(4)(B).

54. 18 U.S.C. § 2252(a)(4)(B) provides that any person commits a federal crime who:

knowingly possesses, or knowingly accesses with intent to view, 1 or more books, magazines, periodicals, films, video tapes, or other matter which contain any visual depiction that has been mailed, or has been shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials which have been mailed or so shipped or transported, by any means including by computer;

55. Each Plaintiff is a victim of Defendant's violation of 18 U.S.C. § 2252(a)(4)(B).

56. The Plaintiffs each elect liquidated damages in the amount of \$150,000 and the cost of the action, including reasonable attorney's fees and other litigation costs reasonably incurred, prejudgment and post-judgment interest, and such other relief as the Court deems appropriate.

57. The Plaintiffs are not seeking "actual damages" under 18 U.S.C. § 2255.

RELIEF REQUESTED

WHEREFORE, the Plaintiffs each request judgment against the Defendant as follows:

58. Liquidated damages in the amount of \$150,000 each pursuant to 18 U.S.C. § 2255(a);

59. Reasonable attorney's fees pursuant to 18 U.S.C. § 2255(a);

60. Litigation costs pursuant to 18 U.S.C. § 2255(a);

61. Pre-judgment and post-judgment interest;

62. Such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by jury.

/s/ Laurie Koller
Laurie Koller OBA#16857
KOLLER TRIAL LAW
2504 E. 21ST Street, Suite B
Tulsa, Oklahoma 74114
Phone: (918) 216-9596
Email: laurie@kollertriallaw.com

Attorneys for Plaintiff

MARSH LAW FIRM, PLLC

By: /s/ James R. Marsh

James R. Marsh

Pro hac vice pending

31 Hudson Yards, 11th Floor

New York, New York 10001

Phone: (212) 372-3030

Email: jamesmarsh@marsh.law

MARSH LAW FIRM PLLC

Cori J. Iacopelli

Pro hac vice pending

31 Hudson Yards, 11th Floor

New York, New York 10001

Phone: (212) 372-3030

Email: coriiacopelli@marsh.law

Attorneys for Plaintiffs Jenny, Jane,
Fiona, Erin, Amy, Jessica, Anna and
Taylor